REMARKS

These remarks are in reply to the Office Action dated June 14, 2007 (Paper No./Mail Date 20070611). Applicant thanks the Examiner for his courtesy and thoughtful consideration of Applicant's questions in the interview of August 28, 2007.

Claims 1, 2, 5, 7-25, 28, and 30-34 stand rejected under 35 U.S.C. §103(a). Claims 8, 15, 16, 28, and 30 have been cancelled. Claims 1, 2, 5, and 7, 9-14, 17-25, 31-34 have been amended. New claim 35 has been added.

Applicant respectfully traverses the rejections.

Rejections Under 35 U.S.C. §103(a)

A.   Amended claim 1 recites: "transforming the image data as it is received by selectively storing some of the <u>pixel components</u> in a memory for access by the display device." Claim 1 stands rejected on some of the same reasoning stated in the previous Office Action, namely that "selectively storing some of the <u>image data</u> in a memory"[1] is shown in Figure 2 of the present application. Applicant maintained in his response to the previous Office Action that "selectively storing some of the pixel components" is not disclosed in Figure 2. As some of the same reasoning is relied on in the present Office Action, applicant requested an interview. In the interview, the Examiner agreed that Figure 2 does not show "selectively storing" pixels, but pointed out language not cited in the Office Action, which begins on page 4 of the present application:

> "Each array of pixels is typically referred to as a frame.
> Because the pixels in a frame are displayed in raster
> sequence, it is common <u>to store</u> the pixels in memory in
> raster sequence."[2]

However, storing *the* pixels of a frame is simply not equivalent to storing *some* pixels of a frame. Moreover, there is nothing in the context of this passage to suggest that that the definite article *the* (as in "the particular pixels included in the frame") should be replaced by the adjective *some* (as in "certain unspecified pixels included in the frame"). The paragraph immediately preceding the quoted language explains the phrase "raster scan pattern." And Figure 2 illustrates a raster scan pattern. In a raster patter, *all*, not some, of the pixels in the display

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[1] Emphasis added.
[2] Emphasis added.

are updated. In addition, "an image on a display device is formed from an array of"
pixels,[3] i.e., a frame. A frame includes *all* of the pixels in the image to be displayed.
In short, the context of the language pointed to by the Examiner is clear. The
storing of a frame of pixels in memory in raster sequence refers to storing *all,* not
some of the pixels in the frame.

Plainly, neither Figure 2 nor the language pointed to by the Examiner
discloses or suggests storing some of a plurality of pixels defining an image for
display in a memory. Moreover, neither Figure 2 nor the quoted background
language discloses storing some pixel components. In the interview, applicant
understood the Examiner to agree that "selectively storing pixel components" is not
taught or suggested by any of the references.

> "To establish *prima facie* obviousness of a claimed invention, all
> the claim limitations must be taught or suggested by the prior
> art."[4]

As not all of the claim limitations are disclosed in the prior art relied on, the Office
Action fails to make out a *prima facie* case of obviousness, and the rejection under
35 U.S.C. §103 is not supported.

B.   Applicant understood the Examiner to say in the interview that the
"selectively storing" language is "not strong enough." In addition, the Examiner
expressed his view that a further search would likely turn up prior art which
discloses this limitation.   The Examiner suggested that additional limitations be
included in claim 1 to further define the "selectively storing" language or to
otherwise narrow the claim. Claim 1 is amended to include further definition of the
phrase "selectively storing."

C.   Claims 2, 5, 7, 9-11, and 35 depend from amended claim 1. These
claims are not obvious for the same reasons that claim 1 is not obvious.

D.   Claim 12 stands rejected on the ground that "since this claim is an
apparatus claim corresponding to the method claim 1, the discussion of claim 1 is
applied hereto." Claim 12 is currently amended.

First, to the extent that any limitations of claim 1 correspond to limitations
in claim 12 before the current amendment, a rejection of claim 24 under 35 U.S.C.
§103 is not supported because the Office Action fails to make out a *prima facie* case

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[3] See first paragraph on page 4.
[4] MPEP 2143.03

of obviousness. As described in A., not all of the claim limitations are disclosed in the prior art relied on.

Second, currently amended claim 12 includes a module "to compute a coordinate location." This language does not correspond to claim 1.

E.   Claims 13-14, and 17-23 depend from amended claim 12. These claims are not obvious for the same reasons that claim 12 is not obvious.

F.   Claim 24 stands rejected on the ground that "the PAA discloses a CPU 84 (i.e., a computer) (Fig. 11) for performing the steps in claim 1." Claim 24 is currently amended.

First, amended claim 24 is directed to a machine-readable medium. No machine of any sort is claimed. It is true that the preamble of claim 24 recites an intended use of the medium, but this is not a limitation and is of no significance to construing the claim.

Second, with respect to "the steps in claim 1," applicant assumes that the Examiner applies the discussion of claim 1 to claim 24 as he does with claim 12. In this regard, as noted above in A., not all of the claim limitations are disclosed in the prior art relied on. Accordingly, the Office Action fails to make out a *prima facie* case of obviousness, and the rejection of claim 24 under 35 U.S.C. §103 is not supported.

G.   Claims 31-34 depend from claim 24. These claims are not obvious for the same reasons that claim 24 is not obvious.

<u>CONCLUSION</u>

Accordingly, claims 1-2, 5, 7, 9-14, 17-25, and 31-35 are in condition for allowance. Applicant respectively requests that claims 1-2, 5, 7, 9-14, 17-25, and 31-35 be allowed, and this application be passed to issue. Should the Examiner feel that a telephone conference would expedite prosecution of this application, the Examiner is invited to call Applicant's attorney, Richard A. Wilhelm (48,786), at (503) 635-1187.

Respectfully submitted,

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